

ORIGINAL



0000105472

BEFORE THE ARIZONA CORPORATION COMM

WILLIAM A. MUNDELL
Chairman
JAMES M. IRVIN
Commissioner
MARC SPITZER
Commissioner

Arizona Corporation Commission

DOCKETED

MAR 12 2002

RECEIVED

2002 MAR 12 P 1:04

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY	
-------------	---

**IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996**

Docket No. T-00000A-97-0238

**AT&T'S COMMENTS ON THE
ARIZONA § 271 PERFORMANCE
INDICATOR DEFINITIONS (PID)
DATA ELEMENT SUMMARY
REPORT**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T"), hereby file their comments on the Arizona § 271 Performance Indicator Definitions (PID) Data Element Summary Report, version 5.0, dated February 26, 2002, a joint report (hereinafter, "Joint Report") of Cap Gemini Telecom Media & Networks U.S., Inc. ("CGE&Y") and Hewlett-Packard Consulting ("HPC"), collectively for the purposes of these comments, the "Testers."

In its previously filed comments on this issue, *i.e.*, AT&T Exhibit 9-3,¹ AT&T criticized CGE&Y and the Pseudo-CLEC (HPC) for not ensuring that accommodations had been made to acquire all of the necessary data elements to satisfy the Test Standards Document ("TSD"), section 7.3.4, requirements. *Exhibit 9-3 at 2-3*. The Testers advise in the Joint Report that they believe it now satisfies the requirement contained in the TSD requirement, admittedly through the use of their alternative approach to verify that the Qwest performance measurements results

¹ AT&T's Comments on the Arizona § 271 Performance Indicator Definitions (PID) Data Element Summary Report, dated February 11, 2002.

for the Pseudo-CLEC are accurately calculated from data obtained from the Pseudo-CLEC. This is an expression of false hope, and an attempt to gain leave from the TSD requirements² and from having to answer the fundamental question – are Qwest’s results accurate? This approach fails to meet the requirements because of the wholesale use of Qwest “ad hoc” data instead of the independently gathered Pseudo-CLEC data.³

The Testers claim to have finally addressed the issue of whether the Qwest “ad hoc” data is complete and have indicated they have determined that extra data has not been inserted into the “ad hoc” databases. This is progress that would be more meaningful if the Testers provided quantitative data that would support the claim of completeness. What remains undone is the step that the Testers claim they cannot take since they failed to develop the requisite data before embarking on the Functionality Test. This means the Commission has to settle for a far less instructive set of results on a critical assessment of Qwest’s ability to accurately calculate performance measurement results that are the yardstick against which the Commission will judge whether Qwest’s ongoing performance is consistent with parity standards and defined benchmarks.

The Testers claim that “[c]alculating PID compliant measures using the Pseudo-CLEC data and Qwest’s adhoc data for the missing data elements results in the independent calculation required by the TSD.” *Joint Report at 4*. The Testers’ self-serving conclusion is wrong. The TSD does not provide for use of the Qwest “ad hoc” data to verify whether the “ad hoc” data is correct. It is ludicrous to suggest that their re-calculations using the identical data that are to be

² TSD, § 7.3.4.

³ *Joint Report at 4*. “Calculate PID compliant measures using the Qwest adhoc data. Reconcile all data elements captured by the Pseudo-CLEC through the gateway notifiers with the Qwest adhoc data to ensure all records are captured and that the adhoc data does not contain any additional records.”

verified are supported by the TSD requirements. It may be the best the Testers can do, but it is a far cry from what they were supposed to do.

The Joint Report indicates it was prepared “to produce a more complete matrix containing all data elements that are required to produce PID compliant disaggregated results and specifically note which elements are not provided by Qwest to the CLEC or independently gathered by the CLEC.” *Id. at 5.* Indeed this is achieved. The TAG now has a very detailed documentation of the data elements that are necessary to calculate the performance measurement results. The TAG also now has a clearer identification of the extent to which the Testers failed to establish the required data elements that were to be captured prior to beginning the Functionality Test.

It is unclear from the Joint Report what the status of the Tasks identified in the Process section is. Intuitively, Tasks 1, 2 and 3 are necessary predicates for the Joint Report, but the Testers should make it clear that these Tasks are complete. Tasks 4, 5 and 6 are obvious follow-on work to the publication of the Joint Report, and the extent to which the Testers have begun these Tasks needs to be identified. Since CGE&Y has been issuing Incident Work Orders (“IWO”) as a result of its analysis of the data (Task 5), it is obvious that task has begun. It is not at all clear whether CGE&Y has completed its analysis, however. It is uncertain that the analysis of section 2.5 of the Functionality Test report has begun (Task 6). The Testers should clarify the extent of the progress made in analyzing the existing section 2.5 for modification pursuant to the results of the PID Matrix project.

The Testers insert some uncertainty as to the completeness of the identification of data elements as shown in Appendix A. In the Findings, the Joint Report states that there are some

290 data elements necessary to perform the calculations, but only 83% of them are accounted for in the Testers' analysis:

HP's initial assessment reveals that there are 71 data elements available (data value = Y in Appendix A) for PID measurement calculation by the TA. There are 53 data elements that are not available (data value = N in Appendix A) and there are 124 data items that contain a portion of the required fields. *Id. at 9.*

The extent to which Appendix A is incomplete (*i.e.*, 248 of the 290 data elements) should be rectified by revising it to account for the balance of the data elements.

The Testers obfuscate the extent to which they can calculate specific measures based on Pseudo-CLEC data in that there is no listing of the specific measures in the Joint Report for which it makes the following claims:

"There are no PID 6.3 measures contained within Appendix C of the MTP that have not been previously identified as capable of producing performance measurement results entirely with Pseudo-CLEC collected test data and compared with results calculated with raw adhoc data obtained by Qwest." *Id. at 9.*

The best way to avoid ambiguity is to state the PIDs for which CGE&Y or the Testers previously identified the results.

The Joint Report contains a minor error in the identification of the appendices. "The analysis specifically examined HP databases and manual paper records (e-mail and fax) for existence of the data elements identified in Appendix B – Missing Functionality Data Elements HP Spreadsheet provided by CGE&Y." *Id.*, § 1.3 (at 6). The spreadsheet is Appendix A and a Glossary is Appendix B.

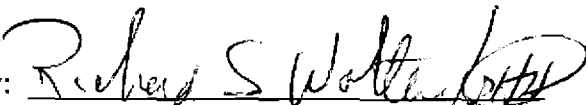
The Joint Report contains a minor error in PID terminology: "PID 6.3 Billing measures OP-7 and OP-13 can be calculated independently using the Pseudo-CLEC captured data. This is

reflected in Section 2.5 of the OSS Test Final Report.” *Id.*, § 1.5 (at 9). PO-7 and OP-13 are not Billing measures; they are Ordering and Provisioning measures.

There is no question that the Testers have spent a considerable amount of time on the Joint Report. However, it falls short of producing or replicating the results that would have been obtained by following the requirements contained in the TSD. AT&T understands the present realities of CGE&Y’s failure to comply with the requirements of the TSD. However, effort alone is no substitute. Nor does it impose on AT&T any responsibility to accept the findings and results of the Joint Report in lieu of compliance with the requirements contained in the TSD. The failure to follow the requirements of the TSD leaves a gap in the testing that the Joint Report does not close.

Dated this 11th day of March, 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

By: 

Richard S. Wolters
1875 Lawrence Street, Suite 1503
Denver, Colorado 80202
Telephone: (303) 298-6741

Gregory H. Hoffman
AT&T
795 Folsom St.
San Francisco, CA 94107-1243

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of **AT&T's Comments On The Arizona § 271 Performance Indicator Definitions (PID) Data Element Summary Report**, Docket No. T-00000A-97-0238, were sent by overnight delivery on March 11, 2002 to:

Arizona Corporation Commission
Docket Control – Utilities Division
1200 West Washington Street
Phoenix, AZ 85007

and a true and correct copy was sent by overnight delivery on March 11, 2002 to:

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Mark A. DiNunzio
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Ernest Johnson
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Christopher Kempley
Arizona Corporation Commission
Legal Division
1200 West Washington Street
Phoenix, AZ 85007

Jane Rodda
Administrative Law Judge
Arizona Corporation Commission
400 West Congress
Tucson, AZ 85701-1347

and a true and correct copy was sent by U. S. Mail on March 11, 2002 to:

Thomas F. Dixon
WorldCom, Inc.
707 – 17th Street, #3900
Denver, CO 80202

Terry Tan
WorldCom, Inc.
201 Spear Street, 9th Floor
San Francisco, CA 94015

K. Megan Doberneck
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80230

Bradley Carroll
Cox Arizona Telcom, L.L.C.
20401 North 29th Avenue
Phoenix, AZ 85027-3148

Michael M. Grant
Gallagher and Kennedy
2575 East Camelback Road
Phoenix, AZ 85016-9225

Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall, Suite 300
Minneapolis MN 55403

Traci Kirkpatrick
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue
Portland, OR 97201

Michael W. Patten
Roshka Heyman & DeWulf, PLC
400 North Fifth Street, Suite 1000
Phoenix, AZ 85004-3906

Joyce Hundley
United States Dept. of Justice
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

Daniel Pozefsky
Residential Utility Consumer Office
2828 North Central Ave., #1200
Phoenix, AZ 85004

Mark N. Rogers
Excell Agent Services, L.L.C.
2175 W. 14th Street
Tempe, AZ 85281

Mark P. Trinchero
Davis Wright Tremaine
1300 SW Fifth Ave., Suite 2300
Portland OR 97201-5682

Penny Bewick
New Edge Networks
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom, Inc.
2101 Webster, Suite 1580
Oakland, CA 94612

Karen L. Clauson
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 1200
Minneapolis, MN 55402

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Avenue, 21st Floor
Phoenix, AZ 85067-6379

Eric S. Heath
Sprint Communications Company L.P.
100 Spear Street, Suite 930
San Francisco, CA 94105

Charles Kallenbach
American Communications Services, Inc.
131 National Business Parkway
Annapolis Junction, MD 20701

Jeffrey W. Crockett
Snell & Wilmer, LLP
One Arizona Center
Phoenix, AZ 85004-0001

Todd C. Wiley
Gallagher & Kennedy, P.A.
2575 East Camelback Road
Phoenix, AZ 85016-9225

Michael B. Hazzard
Kelley, Drye & Warren, LLP
1200 19th Street, NW, Fifth Floor
Washington, DC 20036

Daniel Waggoner
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688

Timothy Berg
Fennemore Craig, P.C.
3003 North Central Ave., #2600
Phoenix, AZ 85012

Raymond S. Heyman
Randall H. Warner
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, AZ 85004

Diane Bacon, Legislative Director
Communications Workers of America
Arizona State Council
District 7 AFL-CIO, CLC
5818 N. 7th Street, Suite 206
Phoenix, AZ 85014-5811

Andrew Crain
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202


Janet Livengood
Regional Vice President
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602

Charles W. Steese
Qwest Corporation
1801 California Street, Suite 4900
Denver, CO 80202

Bill Haas
Richard Lipman
McLeodUSA Telecommunications
Services, Inc.
6400 C Street SW
Cedar Rapids, IA 54206-3177

Brian Thomas
Vice President – Regulatory
Time Warner Telecom, Inc.
520 S.W. 6th Avenue, Suite 300
Portland, OR 97204

Executed on March 11, 2002 in San Francisco, California.



for Shirley S. Woo